

January 11, 2012

VIA EMAIL AND FEDEX OVERNIGHT DELIVERY

Ms. Kristine Koch
Remedial Project Manager
United States Environmental Protection Agency, Region 10
Office of Environmental Cleanup, Mail Code ECL-115
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140
koch.kristine@epamail.epa.gov

RE: Portland Harbor Superfund Site / CERCLA Section 104(e) Information Requests

Dear Ms. Koch:

We are the legal counsel for the The Marine Group, LLC, which received a first request for information letter dated January 18, 2008, with respect to the former operations of Northwest Marine, Inc. at the Swan Island Shipyard, located within the Portland Harbor Superfund Site. Enclosed with this letter is a second supplement to our client's prior responses to EPA's information request letter. There are no documents produced with this second supplement.

We look forward to continuing to work cooperatively with EPA and the other stakeholders at the Site. Please feel free to contact me with any questions or concerns.

Sincerely,



Karen L. Reed

Enclosure

cc: Arthur E. Engel, CEO
The Marine Group, LLC

Raymond A. Parra, General Counsel
BAE Systems San Diego Ship Repair Inc.

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CONFIDENTIAL ALLOCATION INFORMATION

PORTLAND HARBOR SUPERFUND SITE INFORMATION REQUEST SECOND SUPPLEMENTAL RESPONSES FROM THE MARINE GROUP, LLC

Introduction

Respondent The Marine Group, LLC ("Respondent") submitted preliminary partial responses to the first request for information letter dated January 18, 2008 ("Information Request"), to the U.S. Environmental Protection Agency ("EPA") under cover dated May 19, 2008; Respondent submitted final responses to the Information Request to EPA under cover dated November 5, 2008; and Respondent submitted supplemental responses to the Information Request to EPA under cover dated October 4, 2011 (collectively, "Prior Responses"). These second supplemental responses supplement, clarify and correct the Prior Responses, which are by this reference incorporated herein and which remain unchanged except to the extent expressly provided herein.

Second Supplemental Responses

74. Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:

....

c. discuss all changes in the business' legal ownership structure, including any corporate successorship, since the inception of the business entity. For example, a business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the dates and the names of all parties involved;

....

Response 74(c): The final paragraph in Response 74(c) is hereby amended as follows, with the deletion indicated by double strikethrough text, and the addition indicated by double underlined text:

However, when Southwest Marine acquired Northwest Marine, it acquired all the assets and liabilities of Northwest Marine, including any remediation obligation Northwest Marine might have had. Thus, Respondent is in the unenviable position of having joint and several liability (along with its predecessors) for the actions of its predecessors back to 1943, when Northwest Marine Iron Works started operations at the Portland Harbor Superfund Site Shipyard and the Property. Respondent urges EPA to also consider as a valuable information source the prior owner/operator of Northwest Marine, represented by William H. Zavin II, whose contact information is contained in Response 80.

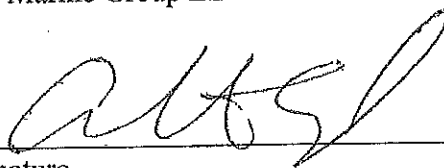
CONFIDENTIAL ALLOCATION INFORMATION

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent and that the foregoing is complete, true, and correct.

Executed on December 19, 2011.

The Marine Group LLC


Signature

Arthur E. Engel
Type or Print Name

Chief Executive Officer
Title

Mailing Address:
1311 First Street
Coronado, CA 92118

January 11, 2012

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Ms. Kristine Koch
Remedial Project Manager
United States Environmental Protection Agency, Region 10
Office of Environmental Cleanup, Mail Code ECL-115
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140
koch.kristine@epamail.epa.gov

RE: Portland Harbor Superfund Site / CERCLA Section 104(e) Information Requests

Dear Ms. Koch:

We are the legal counsel for the BAE Systems San Diego Ship Repair Inc., which received a first request for information letter dated January 18, 2008, with respect to the former operations of Northwest Marine, Inc. at the Swan Island Shipyard, located within the Portland Harbor Superfund Site. Enclosed with this letter is a second supplement to our client's prior responses to EPA's information request letter. There are no documents produced with this second supplement.

We look forward to continuing to work cooperatively with EPA and the other stakeholders at the Site. Please feel free to contact me with any questions or concerns.

Sincerely,



Karen L. Reed

Enclosure

cc: Raymond A. Parra, General Counsel
BAE Systems San Diego Ship Repair Inc.

Arthur E. Engel, CEO
The Marine Group, LLC

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CONFIDENTIAL ALLOCATION INFORMATION

PORTLAND HARBOR SUPERFUND SITE INFORMATION REQUEST SECOND SUPPLEMENTAL RESPONSES FROM BAE SYSTEMS SAN DIEGO SHIP REPAIR INC.

Introduction

Respondent BAE Systems San Diego Ship Repair Inc. ("Respondent") submitted preliminary partial responses to the first request for information letter dated January 18, 2008 ("Information Request"), to the U.S. Environmental Protection Agency ("EPA") under cover dated May 19, 2008; Respondent submitted final responses to the Information Request to EPA under cover dated November 5, 2008; and Respondent submitted supplemental responses to the Information Request to EPA under cover dated October 4, 2011 (collectively, "Prior Responses"). These second supplemental responses supplement, clarify and correct the Prior Responses, which are by this reference incorporated herein and which remain unchanged except to the extent expressly provided herein.

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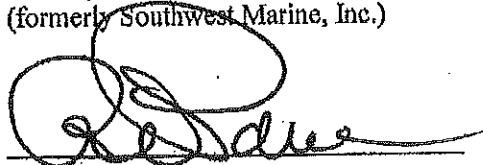
CONFIDENTIAL ALLOCATION INFORMATION

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent and that the foregoing is complete, true, and correct.

Executed on December ____, 2011.

BAE Systems San Diego Ship Repair Inc.
(formerly Southwest Marine, Inc.)


Signature

Raymond A. Parra
Type or Print Name

Assistant Secretary
Title

Mailing Address:
2205 East Belt Street
San Diego, CA 92113